

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF
UNITED PARCEL SERVICE,
REDIRECTED FROM WITNESS BRADELY
(UPS/USPS-T22-9(c.-d.))

The United States Postal Service hereby provides its response to the following interrogatories of the UPS: UPS/USPS-T22-6 - 9(c.-d.), filed on March 23, 2000, and redirected to the Postal Service from witness Bradley.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



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April 6, 2000

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE UNITED PARCEL SERVICE (REDIRECTED
FROM WITNESS BRADLEY, USPS-T-22)

UPS/USPS-T22-9. Refer to footnote 28 on page 38 of your testimony, where you state that "It is my understanding that the air network is sized for a minimum scale." Refer also to the response of the Postal Service to Interrogatory UPS/USPS-TI-17, redirected from witness Xie, in which the Postal Service indicates that on August 29, 1999, the aircraft deployed on the Western network were upgraded from DC-9-30s and DC-9-15s to 727-200s.

(a) On page 38, footnote 28, of your testimony, are you referring to the scale of the Western Network prior to August 27, 1999, or to its current scale?

(b) If you were referring to the scale of the Western Network as it existed in BY98, is it your opinion that currently, following the upgrade to 727-200s the Western Network is still at the minimum efficient scale needed for the transportation of Express Mail?

(c) Provide supporting data by mail class and subclass to show how rising mail volumes have affected the scale of the Western Network.

(d) Provide volume data by mail class for the Western Network from August 20, 1999, through AP4, PY2000.

RESPONSE

(a) Answered by witness Bradley.

(b) Answered by witness Bradley.

(c) The Postal Service does not maintain a data system that records mail class and subclass data of the type requested. Moreover as explained by witness Bradley in his response to part b., the scale of new WNET reflects considerable operational and purchasing considerations. Please also see the Postal Service's response to UPS/USPS-T19-7.

(d) The data needed to answer this interrogatory are not saved in the format to allow such a query. As such, the requested information is not available.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in black ink, appearing to read "E. P. Koetting", is written over a horizontal line.

Eric P. Koetting

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